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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SEA TRADE MARITIME CORPORATION and  
GEORGE PETERS,

*Plaintiffs,*

-against-

STELIOS COUTSODONTIS, FRANCESCA  
COUTSODONTIS, GENERAL MARITIME  
ENTERPRISES CORPORATION, ATTIKA  
INTERNATIONAL NAVIGATION S.A., and  
IASON SHIPPING LTD.,

*Defendants.*  
-----X

No. 09 Civ. 488 (BSJ) (HBP)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Nikolaos A. Kotakis, sworn to on February 4, 2011, the accompanying memorandum of law, and all of the prior pleadings and proceedings herein, defendant GENERAL MARITIME ENTERPRISES CORPORATION, by and through undersigned counsel, will move this Honorable Court at the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York, 10007, at the time and date set by this court:

(1) for an order dismissing the Plaintiffs' Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1), (2), and (6) for lack of subject matter jurisdiction, lack of personal jurisdiction, and failure to state a claim upon which relief can be granted; and

(2) for such other, further, and different relief as the Court deems just and proper.

PLEASE TAKE FUTHER NOTICE that all opposition papers shall be served on or before March 16, 2011, and all reply papers shall be served on or before March 30, 2011.

Dated: New York, New York  
February 7, 2011

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